

Skyline Telephone Memb. Corp.

West Jefferson, NC 2869.

Office: (336) 877-3111

FAX: (336) 877-2020

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2003 OCT -3 PM 1:55

IMPORTANT

TRA DOCKET ROOM

FAX

TRANSMISSION

To: Ron Jones, Director

FAX #: 615-741-5015

From: Sandie Bower

Subject: Docket 03-00502

Company: Term. Reg. Auth.

Date: 10-3-03

Pages: 2

(including this cover)

COMMENTS

I called to notify the TRA that this would be late. I received a call from C. D. Mundy to fax the response to Director Jones. I will mail the original via priority mail for delivery on Monday. If you have any questions or concerns, please call me at 336-982-3800 x.6149



Skyline

Thanks,

Sandie Bower



Skyline

Skyline Telephone Membership Corporation
CORPORATE OFFICES

1200 N.C. Highway 194 North
Post Office Box 759
West Jefferson, NC 28694-0759
Telephone (336) 877-3111 • 800-759-2226
Fax (336) 877-2020 • Website: www.skyline.org

October 3, 2003

Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
RE: Docket No. 03-00502

To Whom It May Concern:

The purpose of this letter is to respond to the docket titled "Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tennessee Code Ann. 65-21-114".

- a) Skyline Telephone Membership Corporation (STMC) provides local EAS calling in Shady Valley (423-739) located in Johnson County, Tennessee, to Mountain City (423-727) which is also located in Johnson County, Tennessee. There are residents located in the Butler exchange (423-768) and the Damascus exchange (276-475) that reside in Johnson County, Tennessee.

In order to comply with Tenn. Code Ann. 65-21-114, STMC is making preparations to participate in the Tennessee state mandated County Wide Calling service. STMC is taking the necessary steps to participate in the state-wide database administered by BellSouth. In order to insure free or reduced intra-county for eligible users, STMC will submit on a *bi-monthly* basis to BellSouth the end user(s) 10-digit telephone number and TAR Code for inclusion this statewide file.

This will allow us to identify the user(s) 10-digit telephone number and TAR Code that may potentially be charged. Using this method, STMC will drop any/all related toll charges to the above mentioned customers that would otherwise be charged.

- b) No technical, operational, administrative or other difficulties have been encountered while attempting to apply with Tenn. Code Ann. 65-21-114(a).
c) No suggestions at this time.

Respectfully,

Sandie Bower

Sandie Bower
Business Operations Officer
Skyline Telephone Membership Corp.

TENNESSEE REGULATORY AUTHORITY

Deborah Taylor Tate, Chairman
Pat Miller, Director
Sara Kyle, Director
Ron Jones, Director



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2003 OCT -3 AM 10:46

460 James Robertson Parkway
Nashville, Tennessee 37243-0505

T.R.A. DOCKET ROOM

October 3, 2003

Mr. David Carpenter, Director of Rates
Piedmont Natural Gas Company
P.O. Box 33068
Charlotte, NC 28233

Re: Nashville Gas Company ACA Filing – Docket No. 03-00317

Dear David:

The six month deadline for the completion and approval of the Staff's audit of Nashville Gas Company's ACA filing is October 28, 2003. Current procedures at the TRA require that the audit report be placed on the Authority conference agenda for the Directors' approval prior to the deadline. That effectively moves the completion date to October 6 in order for the docket to be placed on the October 20 agenda.

The PGA rule provides for an extension of the 180-day notification by mutual consent of both the Company and the TRA Staff. As we discussed a couple of days ago, in order to allow sufficient time for the Staff to complete its audit, I am proposing that the deadline be extended to November 10, 2003, the first Authority Conference in November. The Staff will make every effort to finalize the audit before the Company's fiscal year-end of October 31, 2003.

It is my understanding the Company does not have a problem with the extension. If you have any additional questions regarding this request, please let me know.

Sincerely,

Pat Murphy
Senior Financial Analyst
Energy and Water Division

C: Deborah Taylor Tate, Chairman
Hal Novak, Chief of Energy and Water

Pm03-44.ngcacaextension



BOULT • CUMMINGS
CONNERS • BERRY PLC

Jon E. Hastings
(615) 252-2306
Fax: (615) 252-6306
Email: jhastings@boultcummings.com

2003 OCT -3 PM 12:20

T.R.A. DOCKET ROOM October 3, 2003

Hon. Chairman Deborah Tate
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Workshop to Gather Information from the Telecommunications Industry Related
To Preventing Violations of Tenn. Code Ann. § 654-21-114
Docket No. 03-00502

Dear Chairman Tate:

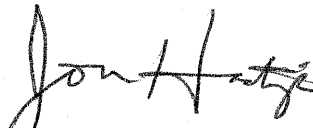
Enclosed please find the original plus fourteen (14) copies of MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Tennessee, Inc., MCI WorldCom Communications, Inc., MCI WorldCom Network Services, Inc., SouthernNet, Inc. d/b/a Telecom*USA and TTI National, Inc.'s Further Response to Notice of Filing dated September 16, 2003 in the above-referenced docket. Please include the attached response with MCI's response filed on October 1, 2003.

Thank you for your assistance in this matter.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Jon E. Hastings

JEH/th

Enclosures

cc: Ken Woods, Esq.

FURTHER RESPONSE OF MCI TO NOTICE OF FILING

Comes now MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Tennessee, Inc., MCI WorldCom Communications, Inc., MCI WorldCom Network Services, Inc., SouthernNet, Inc. d/b/a Telecom*USA, and TTI National, Inc., collectively referred to as "MCI," and further responds to the Notice of Filing dated September 16, 2003 issued by the Tennessee Regulatory Authority ("Authority").

As previously stated, MCI provides telecommunications service in compliance with Tenn. Code Ann. § 65-21-114 (a). Wholesale providers that offer service to other carriers (resellers) but do not offer service to end-users are not subject to this statute. It is the duty of the reseller to insure that eligible calls are toll-free to their end-users, in compliance with the statute.



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

RECEIVED

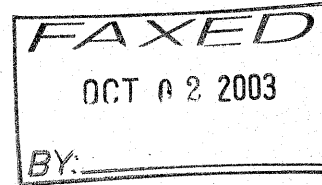
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October 2, 2003

Via Facsimile and Overnight Delivery

T.R.A. DOCKET ROOM

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412



**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Broadwing Communications LLC**

Dear Mr. Jones:

Broadwing Communications LLC ("Broadwing") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

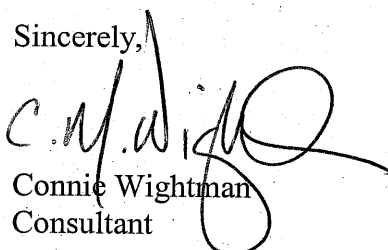
Broadwing is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

Broadwing accesses a database to compare the originating and terminating telephone numbers from call detail records to values from the database (TAR value). When the TAR values match, the call is dropped from further processing and treated as unbillable. This prevents the call from being billed to end users or wholesale resellers of Broadwing's service. The TAR tables are updated monthly from a tape published by BellSouth. The retail billing system also uses a TAR table and verifies the CDR against the TAR table as the record is loaded into the billing system. This acts as a secondary control in the unlikely event that an unbillable call did not drop out with the earlier process. This table also captures any offnet traffic that may be loaded directly into the billing system without going through the on-net system.

The Verizon affiliates have no suggestions as to how the proposed workshop should proceed, but offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose. Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at cwightman@tminc.com.

Sincerely,


Connie Wightman
Consultant

cc: Karen Hanson
File: BWING - TN

TMS: TNx0302



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2003 OCT -3 PM 1:26

T.R.A. DOCKET ROOM

Gregory L. Rogers
Director, State Regulatory Affairs

TEL: (720) 888-2512
FAX: (720) 888-5134
greg.rogers@level3.com

October 2, 2003

VIA OVERNIGHT MAIL

Honorable Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Information Relating to Compliance with Tenn. Code Ann. §65-21-114;
Docket No. 03-00502

Dear Director Jones:

This letter is submitted in response to your September 16, 2003 request in the above named docket. Level 3 Communications, LLC ("Level 3") welcomes the opportunity to provide the Tennessee Regulatory Authority ("TRA") information about its difficult experience bringing itself into compliance with the Tennessee law requiring county-wide local calling and looks forward to working with the TRA to improve the system.

In order to comply with §65-21-114 Level 3 has established a process to provide BellSouth, acting as the TAR Code Administrator, files containing Level 3's telephone numbers and associated TAR code information on the 10th and 20th of each month. In advance of submitting these files to BellSouth, Level 3 verifies all TAR code assignments to the best of its ability by mapping rate centers to Tennessee county boundaries. Level 3 is required to send all Level 3 phone numbers with each submission rather than being allowed to update previous submissions with new phone numbers only.

While Level 3 ultimately established the ability to substantially comply with the county-wide local calling requirements in Tennessee, getting to this point was a difficult and time consuming process. Further, Level 3 believes that there remain inherent issues that mean the system inevitably will encounter problems that require coordinated manual efforts by interconnected telecommunications providers to resolve. Issues that Level 3 encountered during development

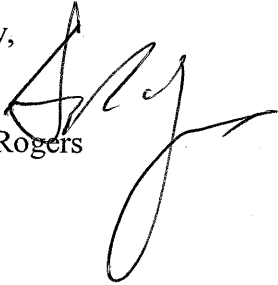
During initial development, Level 3 encountered several file format changes with TAR code administrators. The file format changes delayed Level 3's ability to interface with the TAR code administration and TAR code database. Once the formatting issues were settled, proprietary software had to be purchased by Level 3 to allow for the transmission of the files to BellSouth. Not all of Level 3's PC configurations allow the proprietary software to function properly. Therefore, configuration of a dedicated PC was required.

Once the ability to send information to BellSouth for the TAR code database was resolved, Level 3 undertook the effort to accurately determine proper TAR codes for each of its phone numbers. Because phone numbers do not always have an address associated with them, Level 3 is required to try to match rate centers with counties in order to determine what TAR code should apply. Level 3 found that neither the TAR code administrators nor the TRA was able to provide assistance in determining the county to rate center assignments. Level 3 expects that the lack of uniformity in TAR code assignment practices among telecommunications providers is likely to lead to billing disputes both at the end-user customer and intercarrier levels.

Level 3 does not have specific suggestions for how the TRA should conduct the workshop on this matter at this time. However, should you have any questions or concerns about the information contained herein, please do not hesitate to contact me.

Sincerely,

Greg L. Rogers

A handwritten signature in black ink, appearing to be 'Greg L. Rogers', written over the printed name.



Joe N. Carrisalez
Executive Director
Regulatory

SBC Long Distance
5850 W. Las Positas Blvd.
Pleasanton, CA 94588

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2003 OCT -3 PM 1:26

925.468.5128 Phone
925.468.4660 Fax
jc2352@sbcd.com

October 3, 2003

T.R.A. DOCKET ROOM

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Dear Mr. Jones:

The purpose of this letter is to reply to your request for information in Docket No. 03-00502. In the Notice of Filing in Docket No. 03-00502 dated September 16, 2003 you directed all facilities based providers and resellers of telecommunications services certificated in the State of Tennessee to respond to the inquiries below by no later than Wednesday, October 1, 2003. Southwestern Bell Communications Services, Inc. ("SBCS") is certified in the state of Tennessee and provides resold interexchange services. On Tuesday, September 30, 2003 SBCS contacted the Tennessee Regulatory Authority to request an extension for filing our responses. On Wednesday, October 1, SBCS was notified that an extension until Friday, October 3, 2003 was approved.

Following are SBCS responses

Item 1: Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. 65-21-114(a). If you do not currently take steps to ensure compliance with 65-21-114(a), explain your reason for not doing so.

Reply1: SBCS is in compliance with the July 20, 2001 Attorney General for the State of Tennessee opinion No. 01-115 that excludes SBCS from county wide toll free calling requirements. The Attorney General's opinion concludes: "While Tenn. Code Ann. 65-21-114 is constitutional in most of its applications, it would be unconstitutional to apply this statute to a long distance telephone carrier under circumstances where the carrier does not receive reasonable remuneration for the service it is required to provide."

Item 2: Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114(a).

Reply 2: SBCS does not have specific examples of technical, operational or administrative difficulties.

Item 3: Provide a suggestion for how this workshop should proceed.

Reply 3: SBCS suggests the following process for consideration:

- Define the purpose or goal(s) for providing county-wide toll free calling
- Analyze the current and evolving highly competitive offerings of local, long distance and wireless service providers. This analysis should be focused on whether these providers individually or through their highly competitive bundled, local-long distance-and wireless, packages accomplish the goals of county-wide toll free calling.
- If these evolving bundled service offerings accomplish the goals of county-wide toll free calling, there may be no further need for a specific program.
- If it is determined that these evolving offerings will not accomplish the stated goals, then SBCS would suggest the investigation should turn to the legal issues involved with requiring the various telecommunications industry participants, i.e. interexchange carriers, wireless, wholesale providers etc., to provide county-wide toll free service. The legal issues should resolve prior to exploration of the technical, operational, and administrative difficulties.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Carrisalez". The signature is fluid and cursive, with the first name "Joe" and last name "Carrisalez" clearly distinguishable.

Joe Carrisalez
Executive Director Regulatory - SBCS

STACEY A. KLINZMAN

**MILLER
ISAR** INC.
REGULATORY CONSULTANTS

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

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2003 OCT -3 PM 1:25

T.R.A. DOCKET ROOM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Business Discount Plan, Inc. ("BDP") – Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

Business Discount Plan, Inc., a Tennessee certificated intrastate long distance reseller, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: BDP is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a non-facilities based carrier, BDP does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. BDP's underlying carrier, AT&T, does not provide BDP with CARE records that distinguish intracounty calls from other instate calls.
3. AT&T charges BDP for all calls carried over its network, including intracounty calls.

Mr. Ron Jones
October 1, 2003
Page 2 of 2

4. BDP has not received any complaints from customers regarding intracounty call charges on bills and, therefore, is not aware of whether AT&T is passing through intracounty calls to BDP.
- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

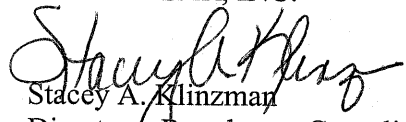
Response: See response above.

- Provide a suggestion for how this workshop should proceed.

Response: BDP has no suggestions for how the workshop should proceed.

Sincerely,

MILLER ISAR, INC.


Stacey A. Klinzman
Director - Regulatory Compliance

Regulatory Consultants to
Business Discount Plan, Inc.

cc: Mr. David Jenkins, President, Business Discount Plan, Inc.

STACEY A. KLINZMAN

**MILLER
ISAR** INC.
REGULATORY CONSULTANTS

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

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T.R.A. DOCKET ROOM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: U.S. Telecom Long Distance, Inc. ("U.S. Telecom") – Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

U.S. Telecom Long Distance, Inc., a Tennessee certificated intrastate long distance reseller, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: U.S. Telecom is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a non-facilities based carrier, U.S. Telecom does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. U.S. Telecom's underlying carrier, Qwest, does not provide U.S. Telecom with CARE records that distinguish intracounty calls from other instate calls.
3. Qwest charges U.S. Telecom for all calls carried over its network, including intracounty calls.

Mr. Ron Jones
October 1, 2003
Page 2 of 2

- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

Response: See response above.

- Provide a suggestion for how this workshop should proceed.

Response: U.S. Telecom has no suggestions for how the workshop should proceed.

Sincerely,

MILLER ISAR, INC.



Stacey A. Klinzman
Director – Regulatory Compliance

Regulatory Consultants to
U.S. Telecom Long Distance, Inc.

cc: Mr. Robert Young, President, U.S. Telecom Long Distance, Inc.

STACEY A. KLINZMAN

**MILLER
ISAR** RECEIVED
2003 OCT -3 PM 1:25
REGULATORY CONSULTANTS
TRA DOCKET ROOM
7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: CIMCO Communications, Inc. ("CIMCO") – Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

CIMCO Communications, Inc., a Tennessee certificated intrastate long distance reseller, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: CIMCO is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a non-facilities based carrier, CIMCO does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. CIMCO's underlying carriers, Global Crossing, AT&T and Qwest, do not provide CIMCO with CARE records that distinguish intracounty calls from other instate calls.
3. To CIMCO's knowledge, CIMCO's underlying carriers charge CIMCO for all calls carried over its network, including intracounty calls.

Mr. Ron Jones
October 1, 2003
Page 2 of 2

4. CIMCO has not received any complaints from customers regarding intracounty call charges on bills and, therefore, is not aware of whether the underlying carriers are passing through intracounty calls to CIMCO.
- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

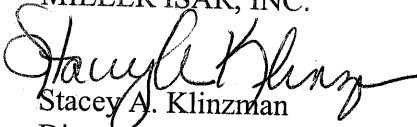
Response: See response above.

- Provide a suggestion for how this workshop should proceed.

Response: CIMCO has no suggestions for how the workshop should proceed.

Sincerely,

MILLER ISAR, INC.


Stacey A. Klinzman
Director - Regulatory Compliance

Regulatory Consultants to
CIMCO Communications, Inc.

cc: Thad Goretski, Treasury Services Manager, CIMCO Communications, Inc.

STACEY A. KLINZMAN

**MILLER
ISAR** INC.
REGULATORY CONSULTANTS

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

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T.R.A. DOCKET ROOM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Granite Telecommunications, LLC ("Granite") – Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

Granite Telecommunications, LLC, a Tennessee certificated facilities-based and resale local exchange carrier and resale interexchange carrier, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: Granite is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a UNE-P based local exchange carrier and a non-facilities based interexchange carrier, Granite does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. Granite's underlying carriers, Bell South, Qwest and Global Crossing, do not provide Granite with CARE records that distinguish intracounty calls from other instate calls.
3. To Granite's knowledge, Granite's underlying carriers charge Granite for all calls carried over its network, including intracounty calls.

Mr. Ron Jones
October 1, 2003
Page 2 of 2

- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

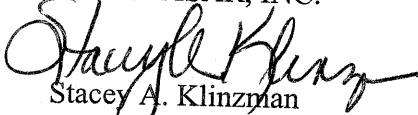
Response: See response above.

- Provide a suggestion for how this workshop should proceed.

Response: Granite has no suggestions for how the workshop should proceed.

Sincerely,

MILLER ISAR, INC.



Stacey A. Klinzman
Director – Regulatory Compliance

Regulatory Consultants to
Granite Telecommunications, LLC

cc: Geoffrey Cookman, Granite Telecommunications, LLC



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GE Capital

2003 OCT -3 PM 1:26
GE Business Productivity Solutions
General Electric Capital Corporation
6540 Powers Ferry Road, Atlanta, GA 30331
1-800-438-2583
www.bizproductivity.com

October 2, 2003

BY FEDERAL EXPRESS

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket No. 03-00502
Workshop to Gather Information from the Telecommunications Industry Related
to Preventing Violations of Tennessee Code Annotated Sec. 65-21-114

Dear Mr. Jones:

With regard to the Notice of Filing in the above-captioned docket (a copy of which is enclosed), GE Business Productivity Solutions, Inc. ("GEBPS"), is providing only long distance services to customers in the State of Tennessee. GEBPS does not provide local service to any customers in Tennessee. Because GEBPS is only a long distance reseller in Tennessee, it is our understanding that no intra-county calls, which are not to be considered toll calls under the Tennessee regulations, should have been forwarded to GEBPS by the local exchange carriers ("LECs") in Tennessee for billing. All such calls should have remained with the LECs for billing to end-user customers, if appropriate.

If you have any questions or if our understanding is incorrect, please call me at 770-644-7774.

Very truly yours,

Meredith H. Gifford
AVP, Regulatory Affairs

Enclosure



WEST KENTUCKY
RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

You can have personal telecommunications.

RECEIVED

2003 OCT -3 PM 1:26

T.R.A. DOCKET ROOM

October 1, 2003

TRA
460 James Robertson Parkway
Nashville, TN 37243

Docket No. 03-00502

**RE: Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. 65-21-114**

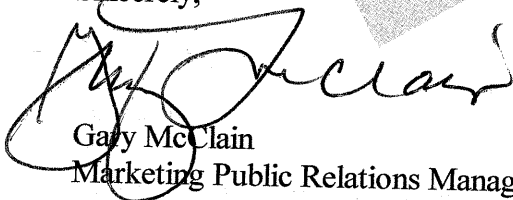
West Kentucky Rural Telephone Cooperative provides telecommunications services to four exchanges physically located in Tennessee but are served by the Owensboro, Kentucky lata. Within the county there is a lata boundary.

West Kentucky Rural Telephone Cooperative is a cooperative. Our understanding is that the TRA does not govern us being we are a cooperative. Since we are not governed by the TRA we are not obligated to offer in county calling free.

Please advise on the status of this because we are constantly getting calls from customers plus dispute claims being registered with the TRA.

Thank you for your prompt attention to this matter.

Sincerely,



Gary McClain
Marketing Public Relations Manager

237 NORTH 8TH STREET

P.O. BOX 649

MAYFIELD, KENTUCKY 42066

TEL: (270) 674-1000

FAX: (270) 856-3651

E-MAIL: support@wk.net



RECEIVED

October 3, 2003

2003 OCT -3 PM 1:26

Via Fax and Overnight Delivery

210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

T.R.A. DOCKET ROOM

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of American Long Lines, Inc.**

Dear Mr. Jones:

American Long Lines, Inc. (ALL) submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

ALL is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

As a switchless reseller in Tennessee, ALL utilize the services of underlying facilities based interexchange carriers. Therefore, ALL is dependent upon the identification of toll free calling based on the systems and databases of the underlying carriers. Currently the primary underlying carrier of ALL in Tennessee is Global Crossing.

ALL has no suggestions as to how the proposed workshop should proceed, but offers any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at croesel@tminc.com.

Sincerely,

Carey Roesel
Consultant

cc: Doug Derstine
File: ALL - TN
TMS: ALL TNx0301



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

RECEIVED

October 3, 2003
2003 OCT -3 PM 1:26 Via Overnight Delivery

TRA. DOCKET ROOM

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Globalcom, Inc.**

Dear Mr. Jones:

Globalcom, Inc., submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Globalcom is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

As a switchless reseller in Tennessee, Globalcom utilize the services of underlying facilities based interexchange carriers. Therefore, Globalcom is dependent upon the identification of toll free calling based on the systems and databases of the underlying carriers.

Globalcom has no suggestions as to how the proposed workshop should proceed, but offers any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at croesel@tminc.com.

Sincerely,

Carey Roesel
Consultant

cc: Eric Harstad
File: Globalcom - TN
TMS: Globalcom TNx0301



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
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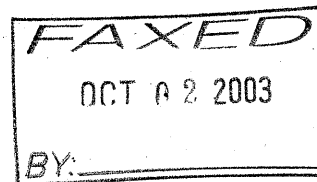
RECEIVED

2003 OCT -3 PM 1:27

October 2, 2003
Via Facsimile and Overnight Delivery

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

T.R.A. DOCKET ROOM



**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Broadwing Communications LLC**

Dear Mr. Jones:

Broadwing Communications LLC ("Broadwing") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

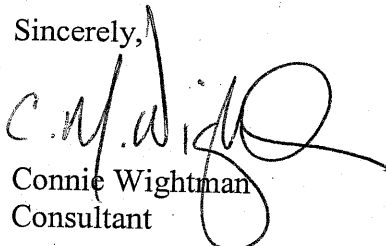
Broadwing is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

Broadwing accesses a database to compare the originating and terminating telephone numbers from call detail records to values from the database (TAR value). When the TAR values match, the call is dropped from further processing and treated as unbillable. This prevents the call from being billed to end users or wholesale resellers of Broadwing's service. The TAR tables are updated monthly from a tape published by BellSouth. The retail billing system also uses a TAR table and verifies the CDR against the TAR table as the record is loaded into the billing system. This acts as a secondary control in the unlikely event that an unbillable call did not drop out with the earlier process. This table also captures any offnet traffic that may be loaded directly into the billing system without going through the on-net system.

The Verizon affiliates have no suggestions as to how the proposed workshop should proceed, but offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose. Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at cwightman@tminc.com.

Sincerely,


Connie Wightman
Consultant

cc: Karen Hanson
File: BWING - TN

TMS: TNx0302



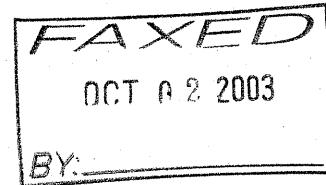
210 N. Park Ave.
Winter Park, FL
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Tel: 407-740-8575
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tmi@tminc.com

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T.R.A. DOCKET ROOM

October 2, 2003
Via Facsimile and Overnight Delivery



Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Broadwing Communications LLC**

Dear Mr. Jones:

Broadwing Communications LLC ("Broadwing") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

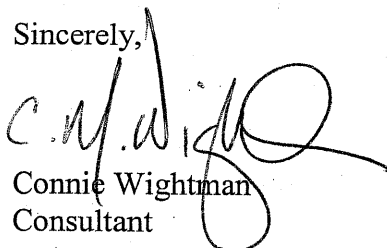
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The Verizon affiliates have no suggestions as to how the proposed workshop should proceed, but offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose. Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at cwrightman@tminc.com.

Sincerely,


Connie Wightman
Consultant

cc: Karen Hanson
File: BWING - TN

TMS: TNx0302